

MISSOURI GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS
SECTION K - CURRENCY TRANSACTION REPORTING

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Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth.

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(11 CSR 45-5.053(1) & 31 USC 103)

General

1. Each Class A Licensee shall ensure that the minimum reporting requirements for Currency Transaction Reports by Casinos (CTRC) are satisfied.
2. Each Class A Licensee shall designate a specific person (CTR Compliance Officer) to be responsible for the day-to-day compliance with the Currency Transaction Reports. The CTR Compliance Officer's name will be forwarded to the MGC Audit Manager. The MGC will be notified of any changes in CTR Compliance Officer personnel.
3. The CTR Compliance Officer will be responsible for developing a training program for casino personnel on compliance with the MGC CTR reporting requirements. This training program will be submitted to the MGC Audit Manager.
4. Compliance with the MICS does not release the Class A Licensee from its obligation to comply with all applicable state and federal regulations.
5. Alternative systems, if applicable, such as automated tracking, shall be included in the ICS.

Reportable Transactions

6. All cash transactions in excess of \$10,000 must be reported on a CTRC. This includes any single transaction or series of related multiple transactions with the same directional flow within the same gaming day. A CTRC shall also be completed for any transaction(s), regardless of the amount, for which an employee has reasonable suspicion that a patron is attempting to circumvent the CTRC reporting requirements. In addition, a CTRC shall be completed for any transaction at the direction of the MGC boat supervisor/agent.
7. Cash transactions involving cash in or cash out in excess of \$10,000 are reportable by casino cage employees and shall include, at least, the following:
 - a. Cash In:
 - 1) safekeeping deposits;
 - 2) purchase of a casino check by a patron;
 - 3) purchase of chips and tokens;
 - 4) exchange of currency for currency, including foreign currency; and
 - 5) any other transaction where cash comes from the patron to the cage.
 - b. Cash Out:
 - 1) chip and token redemptions;
 - 2) payment of winnings (e.g., EGD payouts);
 - 3) safekeeping deposits;
 - 4) cashing checks; and

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth.

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- 5) exchange of currency for currency, including foreign currency.
- 8. Cash transactions involving chip/token redemptions in excess of \$10,000 are reportable either by casino cage or EGD employees.
- 9. Multiple transactions, by or on behalf of any one person during a gaming day which result in either total cash in or total cash out in excess of \$10,000, must be reported on a CTRC. This includes all cash transactions, regardless of the location of the transaction.

Obtaining and Verifying Identification

- 10. Prior to concluding a single cash transaction in excess of \$10,000 or any other transaction which causes the patron's total cash in or cash out to exceed \$10,000, the following patron identification information must be obtained:
 - a. Patron's last name, first name, and (if provided) middle initial;
 - b. patron's full address, including number and street, city, state, zip code, and country if other than United States;
 - c. patron's social security number;
 - d. passport number or alien identification number and issuing country if a patron is an alien or non-resident of the United States;
 - e. type and number of identifications used to verify the above information (e.g., driver's license number and state); and
 - f. date of birth.
- 11. If an individual (agent) is conducting a transaction on behalf of another individual, the same information as described above in 1(a) through (f) must be obtained for the person serving as the agent. This is in addition to the information required for the individual for whom the transaction is being conducted.
- 12. All identification information must be verified by examining the identification presented by the patron. Acceptable identification for U.S. residents includes:
 - a. Driver's license;
 - b. U.S. passport;
 - c. other government-issued photo I.D. cards;
 - d. other form of picture ID with social security card or birth certificate;
 - e. for aliens or non-residents of the United States, acceptable identification includes:
 - 1) passport;
 - 2) alien Identification Card; and
 - 3) other official documents evidencing nationality or residence (e.g., Provincial Driver's License).
 - f. The photo requirement shall be waived on identification issued by jurisdictions not requiring a photo.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth.

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13. Description and number of identifications used to verify patron's identity and address must be included on the CTTC. If a driver's license is used to identify the patron, both the number and state of issuance must be reported.
14. If the patron is unable to provide any of the above information or the identification provided is not acceptable, the transaction must be refused until the necessary information has been obtained.
15. If a patron refuses to provide proper identification, all cash transactions will be stopped and the patron will be barred from any further gaming activity until satisfactory identification is provided.
16. If the denied transaction involves chip redemptions or payment of winnings, and the patron is unable to provide adequate identification in order to verify the patron's identity and address, the patron has the option of keeping the chips or placing them on deposit. This is one instance in which a cashier will be allowed to accept a safekeeping deposit without verifying the patron's identification. However, identification information should be obtained verbally from the patron. A surveillance photo of the individual must be obtained and attached to the casino's copy of the front money deposit receipt. These deposits will not be refunded until proper identification is provided and will only be refunded to the individual in the surveillance photo. The live games manager, assistant casino cage manager, their equivalents, or above, shall approve both the deposit and refund by initialing the deposit receipt before the transaction is completed.

Logging Cash Transactions In Excess of \$3,000

17. Single cash transactions in excess of \$3,000 must be logged in the appropriate casino cage/casino multiple transaction logs. These logs will cover the entire gaming day.
18. Once a patron's aggregated cash activity in the same directional flow has exceeded \$3,000, all additional cash transactions of \$500 or more must be logged regardless of location.
19. The employee witnessing the transaction is responsible for completing the log.
20. Casino cage and live games personnel are responsible for communicating with other personnel to ensure all such transactions are properly logged and any necessary CTTC are completed.
21. Incoming shift personnel shall review the multiple transaction logs at the beginning of their shift to familiarize themselves with the cash activity that occurred during the previous shift.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth.

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- 22. The completed multiple transactions logs are submitted to accounting on a daily basis.
- 23. If a patron refuses to provide their name, social security number, or other identification, such refusal shall be documented in the log by the employee.

Circumvention of Currency Transaction Reporting Requirements

- 24. All employees are prohibited from providing any information to patrons in an effort to assist the patron in circumventing the reporting requirements.
- 25. Employees are responsible for preventing a patron from circumventing the reporting requirements if the employee has knowledge, or through reasonable diligence in performing their duties should have knowledge, of the patron's attempt.
- 26. If a patron requests currency and upon being informed of the CTR reporting requirements, requests a check or a portion of the transaction being both check and currency, or pulls back chips so there is less than \$10,000 involved, the transaction will be handled as a Currency Transaction and all appropriate procedures will be followed. After the CTR is completed, the exchange for the check may then be transacted. This transaction should also be documented as a "suspicious" transaction.
- 27. If a patron refuses to provide any identification, all currency transactions will be terminated and the patron will be barred from any further gaming activity until all the necessary information has been properly provided. Surveillance and Security will be notified. A picture of the patron will be taken by Surveillance, and Surveillance will video tape Security escorting the patron from the gaming area. The patron will not be allowed to return until all necessary information has been provided. The MGC boat supervisor/agent will be notified immediately that a patron refused to give the required information, or is attempting to circumvent the reporting requirements and is being escorted from the gaming area. A copy of the tape and picture of the patron will be supplied to the MGC boat supervisor/agent on board.

Currency Transaction Reports

- 28. A Currency Transaction Report (Internal Revenue Service Form 8362) must be completed for each cash transaction or series of cash transactions in the same gaming day flowing in the same direction, in excess of \$10,000. The employee handling the transaction, the casino cage, or casino employee supervising the qualifying event requiring the filing of a Currency Transaction Report (CTRC) is responsible for ensuring the report is properly completed.
- 29. All CTCRs must be properly filed with the Internal Revenue Service by the 15th day after the date of the transaction.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth.

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Surveillance Photographs

30. For each CTRC, a surveillance photo of the patron must be taken and attached to the casino's copy if a clear copy of photo identification is not received. Surveillance will be notified prior to the completion of the qualifying transaction and take at least one photograph of the patron from the surveillance camera. The photo must include the patron's name printed on the back, and the signatures of both the surveillance operator and the employee witnessing the transaction. When a photograph is not obtainable, a copy of the photograph identification used to verify all identification information may be copied for submission to the MGC in lieu of the surveillance photograph.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth.